

27 June 2025

Mr. Kila Gulo-Vui
Chief Executive Officer
National Information and Communications Technology Authority
PO Box 8444
BOROKO
National Capital District

Dear CEO Gulo-Vui,

**SUBJECT: DATACO RESPONSE TO NICTA DISCUSSION PAPER - PUBLIC INQUIRY
INTO THE POTENTIAL DECLARATION OF CERTAIN WHOLESALE
SERVICES**

On behalf of PNG DataCo Limited (DataCo), we are pleased to submit our formal response to NICTA's Discussion Paper titled "*Public Inquiry into the Potential Declaration of Certain Wholesale Services*" released on 14 May 2025.

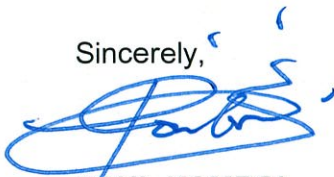
As the state-owned provider of wholesale digital infrastructure and services in Papua New Guinea, DataCo welcomes the opportunity to contribute to this important consultation. Our submission outlines our views on the proposed declarations, including our support for regulatory objectives that align with the overall Government policy objectives as well as our mission to deliver affordable, secure, and efficient national and international connectivity.

DataCo is committed to grow the ICT market through intervention through investments and offerings in the digital infrastructure space and the wholesale market. This is evidenced by our voluntary price reductions and submission of our RIO in mid-2024 even after expiry of the wholesale declaration in February 2024.

We trust that our submission will assist NICTA in its deliberations and we remain available to provide any further clarification or engagement as required.

Please find attached DataCo's full submission for your consideration.

Sincerely,



PAUL KOMBOI, GCL, OBE
Chief Executive Officer



PNG DATACO LIMITED RESPONSE TO DISCUSSION PAPER ON

**“Public Inquiry into the Potential Declaration of Certain
Wholesale Services”**

June 2025

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1. Introduction

On 14th May 2025, NICTA released a discussion paper on the potential for the declaration of certain wholesale services. This submission represents PNG DataCo Limited's ("DataCo's") response to that discussion paper.

DataCo provides various wholesale transmission services to the PNG ICT market which is a key enabler of retail ICT services. As a wholesaler, DataCo provides services based on wholesale pricing to the retail ICT market. The market participants in the retail ICT market in PNG include retail mobile operators (Vodafone, Digicel & Telikom), Enterprise ISPs (Datec, Daltron), and small ISPs.

This submission responds to the key issues raised by NICTA in its discussion paper on the potential declaration of the following wholesale services:

- A. Wholesale international dedicated submarine cable capacity service
- B. International submarine cable facilities access service
- C. Wholesale long-haul dedicated capacity service
- D. Wholesale local dedicated capacity service
- E. Wholesale internet access service

In addition to addressing the above issues raised in the discussion paper, DataCo also wishes to provide an overview of its fundamental approach to the provision of all of the services it provides.

While NICTA, as the ICT regulator, categorizes the main wholesale services and products into standard groupings (A–E), PNG DataCo employs its own distinct and well-defined service and product names, tailored to segment offerings based on the specific needs of its various client groups. The four (4) main types of products/services DataCo offers that can be mapped to the services for potential declaration include:

1. Wholesale Internet Service (WIS) – this maps to NICTA's "E" service

WIS is a bulk internet access service provided by PNG DataCo to Internet Service Providers (ISPs), Mobile Network Operators (MNOs), and large enterprises. It offers high-capacity internet connectivity delivered over DataCo's national and international IP backbone. This service enables downstream providers to offer broadband and other internet-based services to end-users.

2. Point-to-Point LongHaul (P2P LH) – this maps to NICTA's "C" service

P2P Long Haul is a high-capacity, dedicated layer-2 service that connects distant locations across PNG using DataCo's fiber network. E.g., connecting a company's main office in Port Moresby to its branch in Lae. It ensures secure, private, and low-latency transmission between sites such as offices or telecom nodes, making it ideal for intercity connectivity and regional network integration.

3. Point-to-Point Metro (P2P METRO) – this maps to NICTA’s “D” service

P2P Metro provides a similar dedicated transmission service but is designed for **intra-city** or **metropolitan** connectivity. It connects two points within the same urban area—such as within Port Moresby or Lae—using DataCo’s metro fiber rings. It supports fast, low-latency data transmission between urban sites like offices, data centers, or mobile towers, enabling efficient business operations, carrier backhaul, and local network resilience. E.g., connecting two offices within Port Moresby.

4. International Ethernet Private Lease Circuit (IEPLC) – this maps to NICTA’s “A” service

IEPLC is a private international layer-2 service that provides secure, dedicated bandwidth between a customer’s location in PNG and offshore data centers or internet exchanges (e.g., Sydney or Guam) via undersea cables. It offers carrier-grade Ethernet connectivity with consistent low latency, supporting global business communication, cloud access, and international network integration for enterprises and telecom carriers.

In addition to the above services which are the subject of this discussion paper, DataCo also currently provides other wholesale services including satellite based transmission services and DataCentre and Cloud services.

2. Background

2.1 Current nature of the DataCo business

DataCo was established in 2014 with the explicit purpose of providing affordable and secure national and international wholesale Digital Infrastructure, connectivity and services.

DataCo is a state-owned entity mandated by the Papua New Guinea Government to build, own, and operate the National Transmission Network (NTN). As such, DataCo has a key role in delivering national digital infrastructure, including supporting the software and applications ecosystem required to facilitate the government’s digitisation roadmap, while subject to the objectives and constraints of needing to act in a commercial manner and meet the financial performance requirements of its shareholder, KCH.

DataCo now operates and manages over 12,000km of fibre optic network comprising both terrestrial and submarine cables. The network has six (6) international PoPs and five (5) Internet Gateway Nodes in the country, 15 Submarine Cable landing stations and fourteen (14) DWDM PoPs in the country across 21 provinces.

Together with these fibre assets, DataCo operates an extensive satellite network, providing a combination of direct backbone services, redundancy and diversity services and VSAT Hub Services across the country.

2.2 DataCo's Wholesale Role in the PNG ICT Market

PNG DataCo Limited serves as the cornerstone of wholesale transmission services in Papua New Guinea, providing critical backbone infrastructure that enables the delivery of ICT services nationwide. Operating strictly in the wholesale domain, DataCo offers connectivity solutions to all major retail service providers, including Telikom Limited, Digicel PNG, Vodafone PNG, Datec, Daltron, and the ISPs. These retail providers then deliver internet, voice, and data services to end users—individuals, businesses, schools, hospitals, and government agencies.

DataCo's impact on the market has been transformative. Through large-scale investments in submarine and terrestrial fiber optic networks, it has significantly reduced the cost of wholesale internet and transmission services, allowing retail providers to operate more efficiently and, ideally, pass on savings to their customers. This has expanded service reach and improved digital access even in rural and underserved areas.

Importantly, DataCo's presence has brought structure and competition to the wholesale market by creating a transparent, regulated framework under which all retail providers can access transmission infrastructure on non-discriminatory terms. This ensures fair market participation and promotes broader digital inclusion.

Overall, DataCo's wholesale role supports Papua New Guinea's digital economy by fostering connectivity, enabling economic activity, and advancing the government's ICT development goals. Its shared digital infrastructure and services are essential for national development, social inclusion, and modern service delivery.

2.3 DataCo's Pricing and Regulatory Compliance

DataCo's pricing framework is built on the Reference Interconnection Offer (RIO), a regulatory instrument approved by NICTA that outlines service conditions and pricing models for wholesale access. This framework ensures that all wholesale customers receive services on non-discriminatory, transparent, and cost-reflective terms, promoting fair competition across the ICT sector.

The RIO covers various services, such as WIS, P2P LongHaul, P2P Metro connectivity, and international Private Lease Circuits, and specifies service definitions, technical parameters, and pricing formulas. By aligning its internal pricing mechanisms with the RIO, DataCo not only complies with regulatory standards but also enhances market predictability and transparency.

Importantly, this regulated pricing structure supports PNG's broader goal of increasing affordability in the ICT market. Since 2019, DataCo has voluntarily implemented wholesale price reductions, up to 66% in some service areas, which have helped lower operational costs for retail providers.

DataCo's regulatory compliance extends beyond pricing. It also ensures service-level transparency, reporting obligations, and fairness in customer engagement. Adherence to the RIO

strengthens trust with clients and regulators while reinforcing DataCo's role as a reliable and responsible infrastructure provider.

By operating under a clearly defined and regulated pricing regime, DataCo upholds the principles of accountability and accessibility, ensuring that essential transmission services remain affordable and equitably distributed across Papua New Guinea.

2.4 Previous Declaration of February 2019

With effect from 18th February 2019, certain of DataCo's wholesale services were declared by the Minister and subject to regulation by NICTA. These declarations required DataCo to set prices in accordance with the General Pricing Principles under Section 134 of the Act, the Service-Specific Pricing Principles under Section 15, and in accordance with the non-discriminatory obligations under Section 136 of the Act.

The impact of the regulatory framework that DataCo has operated under, together with DataCo's own internal pricing framework and business goals, has been to deliver significant reductions in wholesale internet pricing, exceeding 60% over the past few years. DataCo have focused on lowering prices for metro fibre connectivity, achieving a 66% price reduction, with the aim of encouraging retailers to lower their prices for end-users. DataCo notes that actual retail prices are set independently from DataCo's pricing framework and reflect other inputs such as transmission costs and retail service provider operations and as such, the trajectory of prices for these retail services may vary significantly from the trajectory of DataCo's wholesale prices.

Concerns about the retail price of internet services need to include consideration of both the wholesale and retail segments of the market given that the share of total retail business costs represented by the wholesale element of the supply chain is only a small percentage of the total.

2.5 Alignment of regulated pricing aims and DataCo's pricing aims

Around the world, it is quite common for businesses such as DataCo that provide wholesale services over high capital cost, long-life, infrastructure with monopoly characteristics to have their services declared thereby ensuring some level of regulatory oversight of service delivery and pricing. Monopoly characteristics are seen where it is cheaper and more efficient for the services to be provided over a single network and as such, uneconomic for an alternative service provider to enter the market through developing competing infrastructure. A major aim of such a declaration is to support competition in associated retail markets, thereby ensuring better outcomes for consumers.

This is consistent with DataCo's vision to improve and expand the availability of affordable internet access to all people of Papua New Guinea, through the development of the National Transmission Network (NTN). In order to do this, DataCo must operate efficiently so as to minimise the cost of service provision thereby supporting affordability. At the same time, DataCo must ensure the

financial sustainability of its business. This includes ensuring the financial capability exists to fund necessary capital expenditure to maintain or expand DataCo's core infrastructure. DataCo has identified approximately 1,400 million kina of essential investments over the next three years.

DataCo is concerned that the application of unnecessary or overly complex regulation may undermine DataCo's ability to undertake this investment program. A program that is critical to support expanding the network and ensuring service resilience.

DataCo considers that regulatory objectives applied around the world to the pricing of declared services (and as applied by NICTA) are broadly consistent with DataCo's own business objectives and supporting pricing principles. Broadly, achieving these objectives requires that:

- prices for declared services reflect the efficient costs of providing those services to an agreed minimum standard
- prices should be sufficient to ensure the financial sustainability of the regulated business
- prices should be non-discriminatory, that is, the same price should be charged to all customers taking the same service with an associated need for pricing transparency
- DataCo should remain cognisant of the PNG Government's overarching aims as they affect the provision of wholesale services.

As discussed in more detail below, DataCo recognises that the nature of the wholesale services identified in the discussion paper supports the declaration of certain services. A key concern for DataCo is that any declaration decision for wholesale services does not result in the application of excessive or inappropriate regulation of DataCo's activities.

DataCo believes that its pricing approach, developed over the past ten years since the firm's formation and public commitments to future pricing of wholesale services and the RIO standard offer, clearly exhibits consistency with the above pricing principles and, as such, any regulation flowing from the declaration of wholesale services should recognise this fact and be appropriately structured. For example, reliance on light-handed regulation, such as price monitoring. Should any of these wholesale services be declared, DataCo hopes to work closely with NICTA to develop a simplified, fit-for-purpose regulatory approach.

3. NICTA discussion paper

In its discussion paper, NICTA noted that:

- At NICTA's advice, the Minister declared certain wholesale services on 18th February 2019, including: (i) international submarine cable transmission capacity service, (ii) international submarine cable gateway access services and (iii) international submarine cable duct access service. The Minister concurrently declared the wholesale broadband capacity service.
- At the time of these declarations, the sole provider of these declared services was PNG DataCo Limited.

- Both declarations expired on 27 March 2024, along with the associated Service-Specific Pricing Principles and DataCo's Reference Interconnection Offer ("RIO"). As a result, the supply of the abovementioned declared services is unconstrained by the expired service-specific pricing principles, which may have consequences on the advancement of the competition and efficiency objectives of Part VI of the National Information and Communications Technology Act 2009 (the "Act").
- NICTA is initiating a Public Inquiry issued on 14th May 2025 under Section 230 of the Act into whether certain wholesale services should be declared. In addition to soliciting comments in regards to the Public Inquiry, NICTA also seeks comments from interested parties as to whether the following wholesale services shall be declared under the issued draft declarations:
 - a. Wholesale international dedicated submarine cable capacity service;
 - b. International submarine cable facilities access service;
 - c. Wholesale long-haul dedicated capacity service;
 - d. Wholesale local dedicated capacity service; and
 - e. Wholesale internet access service.
- NICTA also seeks comments as to whether additional wholesale services should be considered for declaration.
- Reasons for NICTA's intervention are understood to be associated with furthering the achievement of the competition and efficiency objectives of Part IV of the Act as set out in Section 124. Specifically, effective competition in the supply of the wholesale services proposed for declaration is non-existent and unlikely to come about in the near and medium term. The lack of effective competition in the markets for the wholesale services proposed for declaration signify that a declaration of service is necessary to further the competition objective of Part VI of the Act in accordance with Section 124 and without these declarations, market forces alone would not provide enough incentive to the access provider to advance Part VI with respect to the supply of these wholesale services. Given that these services are supplied by facilities that cannot be feasibly substituted and that increased access to these services is necessary for promoting effective competition in retail downstream markets, the declaration of service is required to promote the economically efficient use and investment in facilities by which these wholesale services may be supplied.

4. Responses to individual questions set out in NICTA's discussion paper

DataCo's responses to each of the proposed service declarations are presented in this section consistent with the layout of the discussion paper. DataCo has not reproduced NICTA's arguments from the discussion paper, rather it takes the discussion paper as a given.

A. Wholesale International Dedicated Submarine Cable Capacity Service

Question 1.

Do you agree with this market definition. If you do not, please explain your reasons.

With respect to the market for wholesale international dedicated submarine cable capacity service, DataCo **agrees** with NICTA's market definition. That is, this service is separable with defined service boundaries.

Question 2.

Do you agree that the proposed declaration fulfills the declaration criteria in Section 128(a) and (b) by furthering the achievement of the competition objective? If you do not, please explain your reasons.

With respect to the market for wholesale international dedicated submarine cable capacity service, DataCo **agrees** with NICTA that the proposed declaration fulfills the declaration criteria. That is, that declaration of this service will potentially support competition in downstream markets. However, DataCo notes that it remains committed to ensuring that this service is provided in a manner that supports downstream competition as evidenced by the decline in DataCo's prices, regardless of whether this service is declared and as such, the benefits of declaration may be minor. As such, should this service be declared, the regulatory framework should reflect this and be appropriately light-handed.

Question 3.

Do you agree that the proposed declaration fulfills the declaration criteria in Section 128 (a) and (c) by furthering the achievement of the efficiency objective? If you do not, please explain your reasons.

With respect to the market for wholesale international dedicated submarine cable capacity service, DataCo largely **agrees** with NICTA that the proposed declaration fulfills the declaration criteria. That is, that declaration of this service supports the efficient provision of services. However,

DataCo notes that its historic pricing approach and publicly stated commitment to price reductions as demand increases would suggest that declaration will only preserve existing efficiency outcomes and not improve efficiency. In particular, declaration is unlikely to increase utilisation of the assets or demand for the service. As such, should this service be declared, the regulatory framework should reflect this and be appropriately light-handed.

B. International Submarine Cable Facilities Access Service

Question 4.

Do you agree with this market definition. If you do not, please explain your reasons.

With respect to the market for international submarine cable facilities access service, DataCo **agrees** with NICTA's market definition. That is, that this service is separable with defined service boundaries.

Question 5.

Do you agree that the proposed declaration fulfills the declaration criteria in Section 128 (a) and (b) by furthering the achievement of the competition objective? If you do not, please explain your reasons.

With respect to the market for international submarine cable facilities access service, DataCo **agrees** with NICTA that the proposed declaration fulfills the declaration criteria. That is, that declaration of this service will potentially support competition in downstream markets. However, DataCo notes that it remains committed to ensuring that this service is provided in a manner that supports downstream competition as evidenced by the decline in DataCo's prices, regardless of whether this service is declared and as such, the benefits of declaration may be minor. As such, should this service be declared, the regulatory framework should reflect this and be appropriately light-handed.

Question 6.

Do you agree that the proposed declaration fulfills the declaration criteria in Section 128 (a) and (c) by furthering the achievement of the efficiency objective? If you do not, please explain your reasons.

With respect to the market for international submarine cable facilities access service, DataCo largely **agrees** with NICTA that the proposed declaration fulfills the declaration criteria. That is, that declaration of this service supports the efficient provision of services. However, DataCo notes that its historic pricing approach and publicly stated commitment to price reductions as demand increases would suggest that declaration will only preserve existing efficiency outcomes and not improve efficiency. In particular, declaration is unlikely to increase utilisation of the assets or demand for the service. As such, should this service be declared, the regulatory framework should reflect this and be appropriately light-handed.

C. Wholesale Long-Haul Dedicated Capacity Service

Question 7.

Do you agree with this market definition. If you do not please explain your reasons.

With respect to the market for wholesale long-haul dedicated capacity Service, DataCo **agrees** with NICTA's market definition. That is, that this service is separable with defined service boundaries.

Question 8.

Do you agree that the proposed declaration fulfills the declaration criteria in Section 128 (a) and (b) by furthering the achievement of the competition objective? If you do not, please explain your reasons.

With respect to the market for wholesale long-haul dedicated capacity service, DataCo **disagrees**



with NICTA that the proposed declaration fulfills the declaration criteria. DataCo considers that declaration of this service will not support competition in downstream markets.

DataCo notes that this service is currently being provided by Digicel in competition to DataCo. The presence of an existing competing service provider together with the threat of additional competing service providers entering this market suggests that declaring this service will not significantly improve competition.

Also, DataCo notes that it remains committed to ensuring that this service is provided in a manner that supports downstream competition regardless of whether this service is declared. As such, there are unlikely to be any material competition benefits from declaring this service. Should NICTA seek to declare this service, DataCo is of the view that all providers of this service should be subject to the same regulatory requirements to ensure a level playing field and so as to not advantage unregulated providers.

Question 9.

Do you agree that the proposed declaration fulfills the declaration criteria in Section 128 (a) and (c) by furthering the achievement of the efficiency objective? If you do not, please explain your reasons.

With respect to the market for wholesale long-haul dedicated capacity service, **disagrees** with NICTA that the proposed declaration fulfills the declaration criteria. DataCo considers that declaration of this service will not enhance the efficient provision of services.

DataCo notes that this service is currently being provided by Digicel in competition to DataCo. The presence of an existing competing service provider together with the threat of additional competing service providers entering this market suggests that declaration of this service will not lead to any further increase in efficiency as DataCo is already facing significant price competition.

As such, there is unlikely to be any material improvement in the efficiency of supplying this service from declaring it. Should NICTA seek to declare this service, DataCo is of the view that all providers of this service should be subject to the same regulatory requirements to ensure a level playing field and so as to not advantage unregulated providers.

D. Wholesale Local Dedicated Capacity Service

Question 10.

Do you agree with this market definition. If you do not, please explain your reasons.

With respect to the market for wholesale local dedicated capacity service, DataCo **agrees** with NICTA's market definition. That is, that this service is separable with defined service boundaries.

Question 11.

Do you agree that the proposed declaration fulfills the declaration criteria in Section 128 (a) and (b) by furthering the achievement of the competition objective? If you do not, please explain your reasons.

With respect to the market for wholesale local dedicated capacity service, DataCo **disagrees** with NICTA that the proposed declaration fulfills the declaration criteria. DataCo considers that declaration of this service will not support competition in downstream markets.

DataCo notes that this service is currently being provided by Digicel and Telikom in competition to DataCo. The presence of these existing competing service providers, along with the potential for new entrants to the market, indicates that declaring this service will not significantly improve competition.

Also, DataCo notes that it remains committed to ensuring that this service is provided in a manner that supports downstream competition regardless of whether this service is declared. As such, there are unlikely to be any material competition benefits from declaring this service. Should NICTA seek to declare this service, DataCo is of the view that all providers of this service should be subject to the same regulatory requirements to ensure a level playing field and so as to not advantage unregulated providers.



Question 12.

Do you agree that the proposed declaration fulfills the declaration criteria in Section 128 (a) and (c) by furthering the achievement of the efficiency objective? If you do not, please explain your reasons.

With respect to the market for wholesale local dedicated capacity service, DataCo **disagrees** with NICTA that the proposed declaration fulfills the declaration criteria. DataCo considers that declaration of this service will not enhance the efficient provision of services.

DataCo notes that this service is currently being provided by Digicel and Telikom in competition to DataCo. The presence of these existing competing service providers together with the threat of additional competing service providers suggests that declaration of this service will not lead to any further increase in efficiency as DataCo is already facing significant price competition.

As such, there is unlikely to be any material improvement in the efficiency of supplying this service from declaring it. Should NICTA seek to declare this service, DataCo is of the view that all providers of this service should be subject to the same regulatory requirements to ensure a level playing field and so as to not advantage unregulated providers.

E. Wholesale Internet Access Service

Question 13.

Do you agree with this market definition. If you do not, please explain your reasons.

With respect to the market for wholesale internet access service, DataCo **agrees** with NICTA's market definition. That is, that this service is separable with defined service boundaries.

Question 14.

Do you agree that the proposed declaration fulfills the declaration criteria in Section 128 (a) and (b) by furthering the achievement of the competition objective? If you do not, please explain your reasons.

With respect to the market for wholesale internet access service, DataCo **disagrees** with NICTA that the proposed declaration fulfills the declaration criteria. DataCo considers that declaration of this service will not support competition in downstream markets.

DataCo notes that all individual network licence holders and individual application licence holders are legally able to provide wholesale internet access services. There are already other networks providing this service in competition to DataCo as allowed under the 17 May 2023 gazette “notice of making a regulatory instrument” ([FTI.6&7 No.-G368-Notice-of-Making-of-Regulatory-instrument-under-National-ICT-Act-2009](#)). The presence of these existing competing service providers, along with the potential for new entrants to the market, indicates that declaring this service will not significantly improve competition.

Further, DataCo notes that it remains committed to ensuring that this service is provided in a manner that supports downstream competition regardless of whether this service is declared. As such, there are unlikely to be any material competition benefits from declaring this service. Should NICTA seek to declare this service, DataCo is of the view that all providers of this service should be subject to the same regulatory requirements to ensure a level playing field and so as to not advantage unregulated providers.

Question 15.

Do you agree that the proposed declaration fulfills the declaration criteria in Section 128 (a) and (c) by furthering the achievement of the efficiency objective? If you do not, please explain your reasons.

With respect to the market for wholesale internet access service, DataCo **disagrees** with NICTA that the proposed declaration fulfills the declaration criteria. DataCo considers that declaration of this service will not enhance the efficient provision of services.

DataCo notes that there are already other networks providing this service in competition to DataCo as allowed under the 17 May 2023 gazette “notice of making a regulatory instrument”

(FTI.6&7 No.-G368-Notice-of-Making-of-Regulatory-instrument-under-National-ICT-Act-2009).

The presence of these existing competing service providers together with the threat of additional competing service providers suggests that declaration of this service will not lead to any further increase in efficiency as DataCo is already facing significant price competition.

Further, DataCo notes that its historic pricing approach and publicly stated commitment to price reductions as demand increases would suggest that declaration will only preserve existing efficiency outcomes and not improve efficiency. In particular, declaration is unlikely to increase utilisation of the assets or demand for the service. As such, there is unlikely to be any material improvement in the efficiency of supplying this service from declaring it. Should NICTA seek to declare this service, DataCo is of the view that all providers of this service should be subject to the same regulatory requirements to ensure a level playing field and so as to not advantage unregulated providers.

5. Conclusion

As a public enterprise, DataCo's mandate already includes public benefit considerations. Recognizing this, regulation should support and incentivize further infrastructure investment, digital inclusion, and affordability, not hinder them through excessive compliance burdens.

Therefore, DataCo prefers that NICTA adopt a balanced regulatory strategy, one that safeguards against market failures while fostering growth, service innovation, and universal access.

PNG DataCo Limited remains deeply committed to Papua New Guinea's digital transformation. As the country's primary wholesale infrastructure provider, DataCo has played a pivotal role in expanding connectivity, improving service affordability, and supporting digital access across sectors, from education and health to commerce and public administration.

Over-regulation could discourage investment, delay network upgrades, and limit innovation. DataCo believes that its existing compliance with the RIO, voluntary price reductions, and alignment with national development priorities demonstrate that a cooperative regulatory model is more effective.

A flexible, proportionate framework allows for adjustments as market conditions evolve. For instance, where competition has emerged or where services are no longer bottlenecks, regulation could be scaled back.

DataCo fully supports NICTA's mandate to promote fairness, efficient investment, and universal access. However, it emphasizes that regulatory actions must be proportionate, forward-looking, and based on evidence. Striking the right balance will allow stakeholders to collectively deliver meaningful outcomes for the country.

Collaboration is key. DataCo is ready to engage with NICTA, retail providers, and other stakeholders to ensure that policy, infrastructure, and service delivery are aligned with the broader development goals of the nation.



These include reducing the digital divide, enhancing economic inclusion, and preparing PNG for a digital future.

Going forward, DataCo will continue investing in robust infrastructure, refining its services, and maintaining transparency in its operations. Together with NICTA and the broader ICT community, it aims to build an inclusive, competitive, and sustainable digital ecosystem for all Papua New Guineans.

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